

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
Sabine Storage & Operations, Inc.,	§	Case No. 22-30670
	§	
Debtor.	§	Subchapter V

**NOTICE OF APPEARANCE, REQUEST FOR ALL
NOTICES, AND DEMAND FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that JOSEPH G. EPSTEIN PLLC ("*Epstein*") appears on behalf of ZIONS BANCORPORATION, N.A. D/B/A AMEGY BANK, the holder of claims against the Debtor and a party in interest, hereby submits this notice of appearance in the above-captioned proceeding and requests notice of all hearings and conferences herein and makes a demand for service of all papers herein, including all papers and notices pursuant to Bankruptcy Rules 2002, 3017, 9007 and 9010 and §1109(b) of the Bankruptcy Code. All notices given or required to be given in this case shall be given to and served upon Epstein at the following address:

Joseph G. Epstein
JOSEPH G. EPSTEIN PLLC
P.O. Box 1228
Bellaire, TX 77402-1228
Telephone: (713) 222-8400
joe@epsteintexaslaw.com

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and section of the Bankruptcy Code specified above, but also includes, without limitation, the schedules, statement of financial affairs, operating reports, any plan of reorganization or disclosure statement, any letter, application, motion, complaint, objection, claim, demand, hearing, petition, pleadings or request, discovery request, deposition notice, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, electronic mail, telephone, telegraph, telex or otherwise filed with or delivered to the Bankruptcy Clerk, Clerk, Court or judge (as those terms are defined in Bankruptcy Rule 9001) in connection with and with regard to the above-referenced bankruptcy case and any proceedings related thereto.

PLEASE TAKE FURTHER NOTICE that the neither this demand nor any later appearance, pleading, proof of claim, claim, or suit shall constitute waiver of: (i) the right to have final orders in noncore matters entered only after *de novo* review by a District Judge; (ii)

the right to trial by jury in any proceeding triable in these cases, or any case, controversy, or proceedings related to these cases; (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (iv) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this Notice; (v) an election of any remedy; and (vi) any other rights, claims, actions, defenses, setoffs, and recoupments as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

DATED: March 17, 2022

Respectfully submitted,

JOSEPH G. EPSTEIN PLLC

PO Box 1228

Bellaire, Texas 77402

(713) 222-8400

By: /s/Joseph G. Epstein

Joseph G. Epstein

State Bar No. 06639320

Southern District No. 11733

ATTORNEYS FOR ZIONS

BANCORPORATION, N.A. D/B/A

AMEGY BANK

CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2022, a true and correct copy of the foregoing Notice of Appearance was electronically mailed to the parties that are registered or otherwise entitled to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District.

/s/Joseph G. Epstein

Joseph G. Epstein